Virgin Records America, Inc v. Thomas Doc. 265

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CAPITOL RECORDS INC., a Delaware corporation; SONY BMG MUSIC ENTERTAINMENT, a Delaware general partnership; ARISTA RECORDS LLC, a Delaware limited liability company; INTERSCOPE RECORDS, a California general partnership; WARNER BROS. RECORDS INC., a Delaware corporation; and UMG RECORDINGS, INC., a Delaware corporation,	))))))))	Civil Action No. 06-cv-1497 (MJD/RLE) **AFFIDAVIT OF GARRETT D. BLANCHFIELD, JR.**

Plaintiffs,

v.

Jammie Thomas,

Defendant.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, Garrett D. Blanchfield, Jr., being duly sworn on oath deposes and states:

1. I am a partner with the firm of Reinhardt Wendorf & Blanchfield, counsel for Defendant Jammie Thomas. I am submitting this Affidavit in support of defendant's Motion to Suppress Evidence.

2. Attached as Exhibit A is a true and correct copy of an April 29, 2009 list of private investigators licensed in Minnesota.

Dockets.Justia.com

3. Attached as Exhibit B is a true and correct copy of a February 19, 2008 article entitled "MediaSentry Removes Investigative Language."

4. Attached as Exhibit C is a true and correct copy correspondence regarding investigations of MediaSentry in other states.

5. Attached as Exhibit D is a true and correct copy of the July 24, 2007 testimony of Professor M. Eric Johnson before the Committee on Oversight and Government Reform United States House of Representatives on Inadvertant File Sharing Over Peer-to-Peer Networks.

6. Attached as Exhibit E is a true and correct copy of examples of inadvertant file sharing.

7. Attached as Exhibit F is a true and correct copy of the Kazaa End User License Agreement (February 2005).

8. Attached as Exhibit G is a true and correct copy of the September 26, 2006 Declaration of Bradley A. Buckles, Esq. In Support of Plaintiffs' Motion for Protective Order.

FURTHER YOUR AFFIANT SAYETH NOT.

____
Garrett D. Blanchfield, Jr.

Subscribed and sworn to before me
this 1st day of June, 2009.

____
Notary Public

KATHLEEN A. SCHULTE
Notary Public
State of Minnesota